

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND**

JUDY JIEN, et al.,

Plaintiffs,

v.

PERDUE FARMS, INC., et al.,

Defendants.

C.A. No. 1:19-CV-2521-SAG

**JOINT STIPULATION [PROPOSED]  
ORDER AMENDING SCHEDULING  
ORDER FOR NEWLY ADDED  
DEFENDANTS**

The Plaintiffs and the Newly Added Defendants<sup>1</sup> in the above-captioned matter (collectively, the “Parties”), by and through their undersigned counsel and pursuant to Local Rule 105.9, stipulate as follows:

WHEREAS, on March 30, 2022, the Court entered Joint Stipulated Scheduling Order for Newly Added Defendants (Dkt. 621);

WHEREAS, at Newly Added Defendants’ request, Plaintiffs agreed to extend the deadline for the Newly Added Defendants to propose search terms for two weeks, with an eight day extension for Plaintiffs to propose additional search terms;

WHEREAS, the other deadlines of the Joint Stipulated Scheduling Order for Newly Added Defendants shall not be amended by this Stipulation;

THE PARTIES RESPECTFULLY REQUEST that the Court order that the deadlines of the Joint Stipulated Scheduling Order for Newly Added Defendants be modified as follows:

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<sup>1</sup> The Newly Added Defendants are: Allen Harim Foods, LLC, Amick Farms, LLC, Case Foods, Inc., Case Farms, LLC, Foster Poultry Farms, Mar-Jac Poultry, Inc., and O.K. Foods, Inc.

| <u>Event</u>  | <u>Prior Deadline</u>   | <u>Revised Deadline</u>   |
|---|---|---|
| <b>Producing Parties Propose Document Custodians, Non-Custodial Document Sources, Search Terms, Custodian Cellphone Information, and Reasonably Available Organizational Charts for Entire Class Period</b> | <b>14 Days After Parties Exchange of Responses and Objections to Initial Rule 34 Requests</b>           | <b>Unchanged except that the Newly Added Defendants will propose search terms on or before September 20, 2022</b> |
| <b>Requesting Parties Propose Additional Search Terms</b>   | <b>7 Days After Requesting Parties Propose Additional Custodians and Non-Custodial Document Sources</b> | <b>September 28, 2022</b>   |

**SO ORDERED.**

Dated: \_\_\_\_\_

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HON. STEPHANIE A. GALLAGHER

Dated: September 20, 2022

Respectfully submitted,

/s/ Brent W. Johnson

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*Attorneys for O.K. Foods, Inc.*

### **CERTIFICATE OF SERVICE**

I hereby certify that on September 20, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice to counsel for all parties that have appeared in this case.

*/s/ Michael C. Heyden, Jr.* \_\_\_\_\_